

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-3664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' Administrative Motion to Seal Documents Pursuant to Dkt. 358 ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
GOOG-BRWN-00409986 (Dkt. 360-1)	GRANTED as to redacted portions at:  Pages 1-2	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project, links, and goals, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects, documents, and practices relating to competing products.
GOOG-BRWN-00226088 (Dkt. 360-2)	GRANTED as to redacted portions at:  page 3	The information requested to be sealed contains Google's highly confidential and proprietary information regarding encryption of Google's produced document, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and

1			falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information may place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal documents subject to the Protective Order in this case.
2			
3			
4			
5			
6	GOOG-BRWN-00225677 (Dkt. 360-4)	GRANTED as to redacted portions at: page 4	The information requested to be sealed contains Google's highly confidential and proprietary information regarding encryption of Google's produced document, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information may place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal documents subject to the Protective Order in this case. .
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17	GOOG-BRWN-00477510 (Dkt. 360-5)	GRANTED as to redacted portions at: Redacted in its entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to internal research and methodology, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

		third parties may seek to use the information to compromise Google's internal projects and practices relating to competing products.
GOOG-CABR-03750737 (Dkt. 360-9)	GRANTED as to redacted portions at:  Pages 8-10, 16, 17, 21	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to proprietary and potential features of its product, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's features and practices relating to competing products.
GOOG-BRWN-00140297 (Dkt. 360-14)	GRANTED as to redacted portions at:  Pages 15, 17, 20-23, 27, 29, 31-33	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to proprietary and potential features of its product, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as

1			third parties may seek to use the information to compromise Google's features and practices relating to competing products.
2			
3	GOOG-CABR-04991831 (Dkt. 360-15)	GRANTED as to redacted portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to internal projects and proprietary and potential features of its product, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects, features, and practices relating to competing products.
4		page 1	
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17	GOOG-CABR-05269357 (Dkt. 360-16)	GRANTED as to redacted portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to internal projects and products and their proprietary features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It
18		Redacted in its entirety	
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

1			may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects, features and practices relating to competing products.
2			
3			
4	GOOG-BRWN-00457784 (Dkt. 360-17)	GRANTED as to redacted portions at: page 1	The information requested to be sealed contains Google's highly confidential and proprietary information regarding Google's internal systems and operations, including details related to internal projects and discussions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects, features, and practices relating to competing products.
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18	GOOG-BRWN-00048967.C (Dkt. 360-18)	GRANTED as to redacted portions at: Page 33	The information requested to be sealed contains Google's highly confidential and proprietary information regarding encryption of Google's produced document, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information may place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal documents subject to the Protective Order in this case.
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

<p>1 GOOG-BRWN- 2 00388293 (Dkt. 3 360-19)</p>	<p>GRANTED as to redacted portions at:  pages 1, 3</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding Google's internal systems and operations, including details related to internal projects and discussions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects, features, and practices relating to competing products.</p>
<p>15 GOOG-CABR- 16 00501220 (Dkt. 17 360-20)</p>	<p>GRANTED as to redacted portions at:  page 2-3, 5-6</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to internal projects and proprietary and potential features of its product, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects, features, and practices relating</p>



1			to competing products.
2	GOOG-CABR-05269678 (Dkt. 360-21)	GRANTED as to redacted portions at:  Pages 3, 9-13, 15, 18-20, 22-25, 27, 30-32	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to internal projects and proprietary and potential features of its product, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects, features, and practices relating to competing products.
16	24. Mardini Transcript (Excerpt) (Dkt. 360-24)	GRANTED as to redacted portions at:  306:10	The information requested to be sealed contains Google's highly confidential and proprietary information regarding Google's internal systems and operations, including details related to internal projects, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects and



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

		practices relating to competing products.
--	--	---

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE SUSAN VAN KEULEN  
United States Magistrate Judge